

District Judge James L. Robart

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

JULIO CURY, <i>et al.</i> ,	*	Civil Action No.: 2:23-cv-00499-JLR
	*	
Plaintiffs,	*	
	*	
v.	*	PLAINTIFFS' UNOPPOSED MOTION
	*	FOR LEAVE TO FILE SEALED
DEPARTMENT OF STATE, <i>et al.</i> ,	*	EXHIBITS
	*	
Defendants.	*	Noted for Consideration:
	*	January 14, 2025
* * * * *	*	

Plaintiffs hereby request that the Court grant them leave to file certain exhibits to their Memorandum of Points and Authorities in Opposition to Defendants' Motion for Summary Judgment and in Support of Their Cross-Motion for Summary Judgment under seal. These records, like the records filed under seal in Dkt. #23-1, include extremely sensitive personal information about Plaintiff Cury located only in the systems of the Department of State ("State") and United States Customs and Border Protection ("CBP"); in fact, one such exhibit is substantively identical to Dkt. #23-1 and is simply being re-filed with color coding for the court's ease of reference. There is no public interest in the immigration records of a private individual which would outweigh his significant privacy interests, as recognized by Defendants'

1 allegation that even the *names* of third parties must be withheld “to protect the personal privacy
2 of individuals.” (Dkt. #23 at 3.) It would be a manifest injustice to force Cury or any other
3 plaintiff to choose between litigating his right to access government records about himself and
4 keeping sensitive information contained in those records from being disclosed to the general
5 public at large.

6 Defendants’ counsel has stated that they do not oppose this Motion.

7 Date: January 14, 2025

8 Respectfully submitted,

9 /s/ Kelly B. McClanahan
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13 *Counsel for Plaintiffs*

14 I certify that this memorandum contains 311
15 words, in compliance with the Local Civil
16 Rules.